

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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<b>SECURITIES AND EXCHANGE COMMISSION,</b>	:	
	:	
<b>Plaintiff,</b>	:	
	:	<b>18 Civ. 8175 (ER)</b>
<b>— against —</b>	:	
	:	<b>ECF CASE</b>
<b>BARRY C. HONIG, MICHAEL BRAUSER,</b>	:	
<b>JOHN STETSON, JOHN R. O’ROURKE III,</b>	:	
<b>ROBERT LADD, ELLIOT MAZA, BRIAN KELLER,</b>	:	
<b>JOHN H. FORD, ATG CAPITAL LLC, GRQ</b>	:	
<b>CONSULTANTS, INC., HS CONTRARIAN</b>	:	
<b>INVESTMENTS, LLC, GRANDER HOLDINGS, INC.,</b>	:	
<b>and STETSON CAPITAL INVESTMENTS INC.,</b>	:	
	:	
<b>Defendants.</b>	:	
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**STIPULATION AND [PROPOSED] ORDER**

WHEREAS, pursuant to the Court’s Amended Opinion and Order, entered February 25, 2020 (DE 212), Plaintiff Securities and Exchange Commission (the “Commission”) is to serve and file its Second Amended Complaint by March 16, 2020;

WHEREAS, the Commission wishes to further amend its Complaint to add new charges against Defendant Ladd;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff, Securities and Exchange Commission (“Commission”), and Defendant Ladd, through their respective attorneys:

1. Defendant Ladd consents to the filing of the Commission’s Second Amended Complaint, including the new charges against Defendant Ladd, by March 16, 2020; and
2. Defendant Ladd shall move, answer or otherwise respond to the Second Amended Complaint by April 30, 2020.

Dated: New York, NY  
March 12, 2020

ROBERT LADD

By: /s/ Randall Lee

Cooley LLP  
1333 2nd Street, Suite 400  
Santa Monica, CA 90401  
310-883-6485

Attorneys for Defendant Robert Ladd

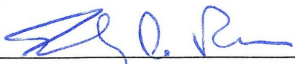
SECURITIES AND EXCHANGE  
COMMISSION

By:   
Jack Kaufman

200 Vesey Street  
Suite 400  
New York, NY 10281  
212-336-0106

Attorneys for Plaintiff Securities and  
Exchange Commission

SO ORDERED:

  
Edgardo Ramos, U.S.D.J  
Dated: Mar. 12, 2020  
New York, New York